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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOSHUA GERSTEIN,
Plaintiff,

v.

CENTRAL INTELLIGENCE AGENCY,
et al.,
Defendants.

Case No. C 06-04643 MMC

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING MOTION
HEARING AND CASE MANAGEMENT
CONFERENCE

The parties hereby stipulate and request as follows:

1. By Order dated April 3, 2008, the Court continued the motion hearing until May 9, 2008 at 9:00 a.m. and the case management scheduling conference until May 23, 2008 at 10:30 a.m.

2. Due to long-scheduled personal commitments, counsel for the government is unavailable on May 9, 2008, the date of the continued motion hearing, and also on May 16, 2008. For this reason, counsel for the government contacted plaintiff to determine if he would stipulate

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1 to postponing the motion hearing. Plaintiff stated he had no objection, as long as the case
2 management conference also was postponed to a date no less than two weeks after the motion
3 hearing.

4 3. Accordingly, the parties request that the motion hearing be continued to May 23, 2008
5 at 9:00 a.m. and that the case management conference be continued to June 6, 2008 at 10:30 a.m.,
6 or later dates acceptable to the Court. The parties further stipulate that the joint case management
7 report will be filed no later than 10 days prior to the case management conference (i.e., on May
8 27, 2008 if the conference is rescheduled for June 6, 2008).


9 IT IS SO STIPULATED.

10 Respectfully submitted,

11 JOSHUA GERSTEIN

12 
13 Plaintiff

JEFFREY S. BUCHOLTZ
Acting Assistant Attorney General

14 
15 Carlotta P. Wells
16 Senior Trial Counsel
17 United States Department of Justice
18 Civil Division
19 Federal Programs Branch

20 Dated: April 28, 2008


21 Dated: April 28, 2008

~~PROPOSED~~ ORDER

1 Upon the stipulation of the parties and good cause appearing, the motion hearing is
2 ~~May 30~~
postponed to ~~May 23~~, 2008 at 9:00 a.m. and the case management conference is postponed to
3 ~~June 20~~ June 13
June 6, 2008 at 10:30 a.m. The joint case management report shall be filed on or before ~~May 27~~,
4 2008.

5
6 IT IS SO ORDERED.
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9

10 Dated: April 28, 2008


MAXINE C. CHESNEY
United States District Judge